

**REMARKS**

In the Office Action<sup>1</sup>, the Examiner rejected claims 1-91 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application No. 2002/0184610 to Chong et al. ("*Chong*").

Applicants have amended claims 1, 12, 14, 20, 21, 27, 30-32, 34, 37-40, 51, 53, 59, 60, 66, 77, 79, 85, and 86, and cancel claim 35. Claims 1-34 and 36-91 remain pending.

**I. Regarding the rejections of claims 1-91 under 35 U.S.C. §102(e) as being anticipated by *Chong***

In order to properly establish that *Chong* anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Claim 1 recites a method including, for example:

receiving first data reflecting a class file that implements an interface;  
receiving second data reflecting a data representation file that specifies an environment, input parameters, and output parameters for the class

(emphasis added). *Chong* does not teach or suggest at least these elements of claim 1.

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<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

*Chong* discloses a component created by system 100 that comprises and interaction process module, back-end data adapters, presentation layer, etc. (paragraph 0431). *Chong* states that a class is “an encapsulated set of program statements and methods that specify the data and behavior of an object” (paragraph 0131).

The Examiner cites paragraphs 431-434 of *Chong* as allegedly disclosing the claimed “first data” and “second data,” and cites paragraphs 257, 258, and 262 of *Chong* as allegedly disclosing the claimed “associating the packaged data with an activity that may be used in an automated workflow process” (Office Action at page 2).

*Chong* states that each component created by system 100 comprises “all media imported into the component including strings, images, audio files, and speech recognition grammar” (paragraph 0431). Even assuming that the media components constitutes the claimed data, which Applicants do not concede, *Chong* does not teach or suggest the claimed “first data” and second data.” That is, *Chong* does not teach or suggest “receiving first data reflecting a class file that implements an interface,” and “receiving second data reflecting a data representation file that specifies an environment, input parameters, and output parameters for the class,” as recited in claim 1.

Accordingly, *Chong* cannot anticipate claim 1. Claims 2-11 depend from claim 1 and are thus also allowable over *Chong* for at least the same reasons as claim 1. Independent claims 12, 14, 27, 40, 51, 53, 66, 77, and 79, while of different scope, recite elements similar to those of claim 1 and are thus allowable over *Chong* for at least the same reasons discussed above with respect to claim 1. Claims 13, 15-29, 28,

29, 41-50, 52, 54-58, 67-76, 78, and 80-84 are also allowable at least due to their dependence from claims 27, 40, and 66, respectively.

Regarding the rejection of claim 20, *Chong* does not teach or suggest every element of claim 20. For example, claim 20 recites “wherein at least two applications employ the custom activity, each class of the at least two applications is deployed to an appropriate folder in a class path such that the class path is shared by the at least two applications, and subsequent deployments of the at least two applications overwrite the previous application class that was deployed to the class path.”

The Examiner states that “packaging the visual icon with the component such that when the component is loaded the icon is displayed” constitutes the claimed “creating an image reflecting a custom activity” (Office Action at page 4). Even assuming that this is correct, which Applicants do not concede, *Chong* does not teach or suggest the claimed “wherein at least two applications employ the custom activity, each class of the at least two applications is deployed to an appropriate folder in a class path such that the class path is shared by the at least two applications, and subsequent deployments of the at least two applications overwrite the previous application class that was deployed to the class path,” as recited in claim 20.

Accordingly, *Chong* cannot anticipate claim 20. Independent claims 59 and 85, while of different scope, recite elements similar to those of claim 20 and are thus allowable over *Chong* for at least the same reasons discussed above with respect to claim 20.

Regarding the rejection of claim 21, *Chong* does not teach or suggest every element of claim 21. For example, claim 21 recites “wherein the first file and second file

have the same root name and, once the archive file is created, a directory structure is checked to ensure that the directory structure reflects the package structure of class file.”

Even assuming that *Chong* discloses the claimed “first file” and “second file,” which Applicants do not concede, *Chong* does not teach or suggest “wherein the first file and second file have the same root name and, once the archive file is created, a directory structure is checked to ensure that the directory structure reflects a package structure of class file,” as recited in claim 21.

Accordingly, *Chong* cannot anticipate claim 21. Claims 22-26 depend from claim 21 and are thus also allowable over *Chong* for at least the same reasons as claim 21. Independent claims 39, 60 and 86, while of different scope, recite elements similar to those of claim 21 and are thus allowable over *Chong* for at least the same reasons discussed above with respect to claim 21. Claims 61-65 and 87-91 are also allowable at least due to their dependence from claims 60 and 86, respectively.

Regarding the rejection of claim 30, *Chong* does not teach or suggest every element of claim 30. For example, claim 30 recites “wherein the data values of the first hashtable and output arguments of the second hashtable are consistent with one or more data types specified within the data representation file.” The cited portions of *Chong* are silent in regard to this feature. Accordingly, *Chong* cannot anticipate claim 30.

Regarding the rejection of claim 31, *Chong* does not teach or suggest every element of claim 31. For example, claim 31 recites “wherein the data of the first

hashtable and arguments of the second hashtable are consistent with one or more data types specified within the data representation file.”

Accordingly, *Chong* cannot anticipate claim 31. Independent claim 32, while of different scope, recites elements similar to those of claim 31 and are thus allowable over *Chong* for at least the same reasons discussed above with respect to claim 31. Claim 33 are also allowable at least due to their dependence from claim 32, respectively.

Regarding the rejection of claim 34, *Chong* does not teach or suggest every element of claim 34. For example, claim 34 recites “wherein the perform() method is associated with at least a first hashtable including values corresponding to data fields and a second hashtable including values to be placed in the data fields.” The cited portions of *Chong* are silent in regard to this feature.

Accordingly, *Chong* cannot anticipate claim 34. Claim 36 depends from claim 34 and are thus also allowable over *Chong* for at least the same reasons as claim 34.

Regarding the rejection of claims 37 and 38, *Chong* does not teach or suggest every element of these claims. For example, claims 37 recites “wherein at least two applications employ the custom activity, each class of the at least two applications is deployed to an appropriate folder in a class path such that the class path is shared by the at least two applications, and subsequent deployments of the at least two applications overwrite the previous application class that was deployed to the class path,” as recited in claim 37. The cited portions of *Chong* are silent in regard to this feature.

Accordingly, *Chong* cannot anticipate claim 37. Independent claim 38, while of different scope, recites elements similar to those of claim 37 and are thus allowable over *Chong* for at least the same reasons discussed above with respect to claim 37.

## II. Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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